

arrange, at some future date, an appointment with the Secretary to express our views on this matter.

The letter ended with the number where O'Connor could be reached that day.

O'Connor has maintained consistently that he had no intention of seeking a meeting with Secretary Babbitt.¹⁴⁴ Corcoran testified, however, that it was "O'Connor's view . . . that this [was] a matter which ought to be brought to the attention of Secretary Babbitt."¹⁴⁵ Corcoran added, "Pat's view was I want to talk to the boss." Corcoran understood O'Connor to be a longtime friend of, and former fund-raiser for, Babbitt.

By the end of this flurry of activity, the opponent tribes had united their efforts and focused them on a Washington lobbying campaign that targeted, initially, Capitol Hill and the top officials at Interior. Based on the results of that initial phase of the Washington lobby campaign, they ultimately would broaden the Washington audience for the arguments advanced by McCarthy and Kitto to this point.

¹⁴⁴In his civil deposition O'Connor maintained, "Well, I wanted to see Collier because he was going to be a factor in making that decision. And I don't see – it just isn't the way I work. I wouldn't – if I wanted Babbitt, I would go to Babbitt." *Four Feathers v. City of Hudson* Deposition of Patrick O'Connor, Feb. 5, 1998, at 430.

Prior to his involvement in the Hudson matter, however, O'Connor secured at least two meetings with the Secretary on two separate matters involving O'Connor & Hannan clients. In the first instance, O'Connor believes his firm was retained for the sole purpose of securing a meeting with Babbitt. On the second matter, O'Connor reached out to Collier for help in scheduling an appointment with the Secretary directly. Collier commented during this investigation that O'Connor was "off the charts" in his persistent attempts to contact the Secretary about that second matter. OIC Interview of Thomas Collier, May 14, 1999, at 9 (hereinafter "OIC Collier Int.").

¹⁴⁵Grand Jury Testimony of Thomas Corcoran, June 6, 1999, at 58-59 (hereinafter "Corcoran G.J. Test.").